

EXHIBIT 12

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)	
)	
Plaintiff,)	
)	Case No.
vs.)	3:17-cv-000939-WHA
)	
UBER TECHNOLOGIES, INC.;)	
OTTOMOTTO LLC; OTTO TRUCKING,)	
INC.,)	
)	
Defendants.)	
)	

*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF ZACHARY MORRISS
San Francisco, California
Wednesday, July 26, 2017
Volume I

Reported by:

CARLA SOARES
CSR No. 5908
Job No. 2661294

Pages 1 - 295

Page 122

11:57:59

1 possibly be because there's [REDACTED]

2 as opposed to [REDACTED]

3 BY MS. CHANG:

4 Q Does [REDACTED]

5 MR. SCHMIDT: Objection to form.

11:58:17

6 THE WITNESS: Yes. To the best of my

7 knowledge, [REDACTED]

8 [REDACTED]

9 BY MS. CHANG:

10 Q What is your understanding of what

11:58:28

11 [REDACTED] means?

12 MR. SCHMIDT: Objection to form.

13 THE WITNESS: As I understand it, it means

14 that there are [REDACTED]

15 [REDACTED]

11:58:40

16 BY MS. CHANG:

17 Q Is that something that's known outside of

18 Waymo?

19 MR. SCHMIDT: Objection to form.

20 THE WITNESS: I'm confused. Are [REDACTED]

11:58:54

21 [REDACTED] known outside of Waymo?

22 BY MS. CHANG:

23 Q Yes.

24 A Yes. They're used in -- they're used in

25 [REDACTED]

11:59:06

Page 123

11:59:12

1 Q For the record, could you state what [REDACTED]
2 stands for?

3 A A [REDACTED]
4 [REDACTED]

5 Q Continuing on with Trade Secret 48 on
6 page 31 of Exhibit 1079, the next statement reads,
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]

11:59:32

11:59:49

10
11
12 Do you know what is being referred to as
13 the unique proprietary design?

14 MR. SCHMIDT: Objection to form.

15 THE WITNESS: It's tough for me to speak
16 to the legalese in here. I would say that there are
17 aspects of PBr -- sorry -- of KBr that are
18 architecturally obvious. But those are very
19 high-level aspects, and getting the details right in
20 the implementation are some of the special, unique
21 things to KBr that are not as obvious.

12:00:06

12:00:21

22 BY MS. CHANG:

23 Q Starting with the obvious features, can
24 you describe what aspects you would consider obvious
25 of KBr?

12:00:33

Page 149

12:36:29

1 BY MS. CHANG:

2 Q When you were working on [REDACTED]
3 [REDACTED] for KBr, did you do any research
4 regarding [REDACTED]

5 MR. SCHMIDT: Objection to form.

12:37:20

6 THE WITNESS: I certainly Googled [REDACTED]
7 designs and stuff like that to familiarize myself.
8 I think I bought a book off of Amazon about fiber
9 laser design.

10 BY MS. CHANG:

12:37:35

11 Q During the course of that research, did
12 you find that a [REDACTED] was used in
13 LiDAR applications?

14 MR. SCHMIDT: Objection to form.

15 THE WITNESS: [REDACTED] is a
16 known method of [REDACTED]
17 LiDAR applications.

12:37:45

18 But just because you have [REDACTED] of
19 [REDACTED] doesn't mean you have a successful
20 design that meets a certain spec or criteria.

12:38:00

21 BY MS. CHANG:

22 Q During the course of your research, did
23 you find that [REDACTED]
24 [REDACTED] were used in [REDACTED]
25 applications?

12:38:12

Page 150

12:38:14

1 MR. SCHMIDT: Objection. Form.

2 THE WITNESS: [REDACTED]

3 [REDACTED] are used, yes, in the

4 [REDACTED] of [REDACTED]

5 lasers.

12:38:25

6 MS. CHANG: I'm done with my line of
7 questioning. We can take a lunch break or we can
8 continue on.

9 MR. SCHMIDT: Now is probably a good time
10 for lunch, I think.

12:38:34

11 THE VIDEO OPERATOR: We are off the record
12 at 12:39 p.m.

13 (Recess, 12:39 p.m. - 1:21 p.m.)

14 THE VIDEO OPERATOR: We are back on the
15 record at 1:21 p.m.

13:21:00

16 BY MS. CHANG:

17 Q I'm handing you what's been marked
18 previously as Exhibit 1066.

19 Do you recognize this document?

20 A I do not, no.

13:21:24

21 Q This is a presentation titled "CDR: Laser:
22 Team," having Bates No. WAYMO-UBER-00008220 to 8223.

23 Do you know what CDR stands for?

24 A It's not coming to mind right now.

25 Q If you turn to the second page with Bates

13:21:49

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
a true record of the testimony given.

Further, that if the foregoing pertains to
the original transcript of a deposition in a Federal
Case, before completion of the proceedings, review
of the transcript [] was [] was not requested.

I further certify I am neither financially
interested in the action nor a relative or employee
of any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date
subscribed my name.

Dated: July 27, 2017

Carla Soares

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CSR No. 5908

Page 295